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November 11, 1995

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FCC TOLL FREE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M. Street N.W. Room 222
Washington, DC 20554

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Ref: FCC Toll Free Service Access Codes, CC Docket No., 95-155

Dear Mr. Caton:

I am very concerned about the above numbered action which deals with the implementation of 888 numbers scheduled to take effect in March 1996. My company, Avanti Communications, is involved in the telecommunications industry. We are a woman owned business and have been involved for the past three years using the 800 platform.

Obviously I am extremely concerned about the implementation of 888 as most of the numbers that I currently provide service on are 800 vanity numbers. I have spent over \$1,000,000 in advertising over the past several years to promote these lines and build a good business that would support me and my employees. Now that business is being placed in jeopardy by competitors who would love to take advantage of all of the money and time I have spent to build this from nothing. I realize that many very large companies that use one or more vanity numbers for ease in consumer recognition will be affected by the release of 888 "replication" numbers into the marketplace.

It is my understanding that one of the options under consideration is the right of first refusal for those customers having 800 vanity numbers. This would require a deposit for the right and give the 800 vanity customer a window to exercise this opportunity. I think that this would be one fair way to handle this protection problem. After all, the customers involved in vanity numbers have all spent millions and millions of dollars to gain consumer recognition in a specific number and it would cause a great deal of confusion to introduce the same number that has been advertised, ie 1800 The Card, with 888 The Card. This is especially true when in fact people will be actively pursuing certain vanity numbers in the hope of profiting from the millions in advertising dollars already spent by current 800 vanity clients. This would certainly occur because of errors in dialing and outright customer confusion.

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This would result in tremendous losses of revenue for our company and could in fact create a situation where many businesses could find themselves out of business as a result of this action. This does not really represent what this county is built upon. The vested interest in both money and time should have some prescedent when dealing with clients with vanity numbers.

This country has and is built on a system of free enterprise and certainly after building a business, which in this case happens to be based on numbers that directly relate to our income such as 1 800 Flowers, it crushes the entrapreneurial spirit if in fact someone else can build a business based our anothers money and efforts and time.

Also we would like to be able to have that right of first refusal as a company and not have to depend upon a RespOrg or our Service Bureau to do this for us. In either of these cases the RespOrg ro Service Bureau could in fact simply dole out the numbers that they wish to without regard to what is ours.

The right of first refusal would certainly be a thought, and of course the deposit required should be equitable taking into consideration that a smaller company like Avanti is not in a position to pay the same rate as a large company such as Hilton Hotels or American Express.

The very core of my right to conduct my business without having to be concerned about a competitor unearthing my vanity numbers and taking advantage by using my vanity on 888.

I am very concerned about protecting the investment I have in my business, which is my 800 numbers which is considerable for a small and minority woman owned business. I must be able to protect my business and my employees. I appreciate your allowing me this platform and hope that my concerns are addressed.

Sincerely,

A handwritten signature in cursive script that reads "Georgene Summers". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Georgene Summers
President